

STATE OF SOUTH CAROLINA)
COUNTY OF GEORGETOWN)

IN THE COURT OF COMMON PLEAS

John Roe and Jane Roe)
Individually and as Parents and Natural)
Guardians of J.D., a minor,)

C. A. No.: 2026-CP-

Plaintiffs,)

SUMMONS

v.)

(Jury Trial Requested)

Warren Spence Perry; Pawleys Island)
Community Church; Pawleys Island)
Christian Academy, a ministry of Pawleys)
Island Community Church; Jennifer "Niki")
Howard, individually and in her capacity as)
former Director of Pawleys Island Christian)
Academy; Donald James Williams,)
individually and in his capacity as former)
Senior Pastor of Pawleys Island Community)
Church; Virginia Lee ("Ginny") Williams,)
individually and in her capacity as a Church)
employee and member of the Church's)
leadership and decision making authority.)

Defendants.)

TO: DEFENDANTS IN THE ABOVE CAPTIONED CASE:

YOU ARE HEREBY SUMMONED and required to appear and defend by answering the Complaint in this action, a copy of which is hereby served upon you, and to serve a copy of your Answer on the subscribers at their offices, 20 Center Street, P.O. Box 1519 Travelers Rest SC 29690, within thirty (30) days after the service hereof, exclusive of the day of such service; and if you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

s/Robert C. Childs, III

Attorney Bar No.1218

Attorney for Plaintiffs

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COUNTY OF GEORGETOWN	)	
	)	
John Roe and Jane Roe	)	C. A. No.: 2026-CP-
Individually and as Parents and Natural	)	
Guardians of J.D., a minor,	)	
	)	
Plaintiffs,	)	
	)	COMPLAINT
v.	)	(Jury Trial Requested)
	)	
Warren Spence Perry; Pawleys Island	)	
Community Church; Pawleys Island	)	
Christian Academy, a ministry of Pawleys	)	
Island Community Church; Jennifer "Niki"	)	
Howard, individually and in her capacity as	)	
former Director of Pawleys Island Christian	)	
Academy; Donald James Williams,	)	
individually and in his capacity as former	)	
Senior Pastor of Pawleys Island Community	)	
Church; Virginia Lee ("Ginny") Williams,	)	
individually and in her capacity as a Church	)	
employee and member of the Church's	)	
leadership and decision making authority.	)	
	)	
Defendants.	)	

Plaintiffs John Roe and Jane Roe, individually and as the Parents and Natural Guardians of J.D., a minor, complaining of the Defendants above named, allege as follows:

JURISDICTION AND VENUE

1. Plaintiffs John Roe and Jane Roe ("Plaintiffs") are adult citizens and residents of Georgetown County, South Carolina. John Roe's and Jane Roe's real names are not contained in this complaint due to protecting their privacy and the privacy of their minor child.
2. Plaintiffs bring this action individually and as the parents and natural guardians of their minor child, J.D.

3. At all times relevant hereto, J.D. was a minor child residing with Plaintiffs and attending Pawleys Island Christian Academy in Georgetown County, South Carolina.
4. Defendant Warren Spence Perry ("Defendant Perry") is an adult citizen and resident of Georgetown County, South Carolina.
5. At all times relevant hereto, Defendant Perry was a registered sex offender and was serving a sentence of probation following his conviction for Sexual Exploitation of a Minor.
6. Upon information and belief, Defendant Pawleys Island Community Church ("Defendant Church") is a South Carolina nonprofit religious corporation authorized to conduct business in the State of South Carolina and located in Georgetown County, South Carolina.
7. Upon information and belief, Defendant Church owned, operated, controlled, supervised, managed, and maintained the premises upon which Pawleys Island Christian Academy operated.
8. Upon information and belief, Defendant Pawleys Island Christian Academy ("Defendant PICA") is either (a) a legal entity whose precise organizational form is presently unknown or (b) the assumed name, ministry, instrumentality, operating division, or other organizational component through which Defendant Church conducted its educational, preschool, childcare, and related operations
9. At all times relevant hereto, Defendant PICA provided educational services and childcare for minor children from preschool through elementary school.
10. At all relevant times, Defendant PICA accepted responsibility for the care, custody, education, supervision, and protection of the minor children entrusted to its care.
11. At all relevant times, Defendant PICA was a registered childcare facility, registration No. 18530.

12. Defendant Jennifer "Niki" Howard ("Defendant Howard") is, upon information and belief, an adult resident of Georgetown County, South Carolina and, at all relevant times, served as the Director and/or Chief Administrator of Defendant PICA.
13. At all relevant times, Defendant Howard exercised supervisory authority over the day-to-day operation of Defendant PICA, its employees, volunteers, visitors, contractors, and the safety of the students attending Defendant PICA.
14. Defendant Donald C. Williams ("Defendant Williams") is, upon information and belief, an adult resident of Georgetown County, South Carolina and, at all times relevant hereto, served as the Senior Pastor of Defendant Church. Upon information and belief, Defendant Williams exercised supervisory authority over Defendant Church, participated in decisions concerning Defendant Church operations and ministries, exercised authority over volunteer activities occurring on Defendant Church property, and participated in decisions affecting the safety and welfare of children attending Defendant PICA.
15. Defendant Virginia Lee ("Ginny") Williams ("Defendant Ginny Williams") is, upon information and belief, an adult resident of Georgetown County, South Carolina who, at all times relevant hereto, was employed by Defendant Church and acted as an employee, agent, representative, and member of Defendant Church leadership with authority to participate in decisions concerning Defendant Church operations, volunteers, childcare operations, and matters affecting Defendant PICA.
16. Whenever reference is made to the acts or omissions of Defendant Church or Defendant PICA, such reference shall include Defendant Williams, Defendant Howard, Defendant Ginny Williams, and all officers, directors, pastors, elders, administrators, employees,

agents, servants, representatives, volunteers, committees, and all persons acting within the course and scope of their authority.

17. Defendants Williams, Defendant Ginny Williams, and Defendant Howard are sued individually for their own tortious acts and omissions, including, but not limited to, their personal knowledge of Defendant Perry's conviction and registration status, their personal authorization, approval, ratification, or acquiescence in Defendant Perry's continued access to Defendant Church and Defendant PICA property, their participation in withholding such information from teachers, parents, and caregivers, and their personal failure to exercise the authority available to them to exclude, supervise, monitor, or otherwise control Defendant Perry.
18. This Court has subject matter jurisdiction over this action pursuant to Article V of the South Carolina Constitution and the laws of the State of South Carolina.
19. Venue is proper in Georgetown County pursuant to S.C. Code Ann. § 15-7-30 because the acts and omissions complained of herein occurred in Georgetown County, South Carolina, the institutional Defendants conduct business in Georgetown County, and Defendant Perry resides or may be found within Georgetown County.
20. Plaintiffs demand a trial by jury on all issues so triable.

FACTUAL ALLEGATIONS

21. Plaintiffs repeat and reallege each and every allegation contained in the preceding paragraphs as though fully set forth herein.
22. At all times relevant hereto, Defendant PICA was a church or religious childcare center registered with the South Carolina Department of Social Services pursuant to Article 9 of Chapter 13, Title 63 of the South Carolina Code. Defendant PICA operated under South

Carolina Child Care Registration No. 18530 and was subject to the statutory requirements governing registered church and religious childcare centers.

23. South Carolina law prohibits a licensed, approved, or registered childcare facility from employing a caregiver or other staff member who is required to register or is registered on the National Crime Information Center National Sex Offender Registry or the South Carolina Sex Offender Registry. S.C. Code Ann. § 63-13-40(A).
24. At all times relevant hereto, Defendant Church owned, operated, maintained, managed, controlled, and supervised Defendant PICA, a private Christian school and childcare ministry located in Georgetown County, South Carolina.
25. At all times relevant hereto, Defendant PICA provided educational and childcare services for preschool and elementary-aged children, including Plaintiffs' minor child, J.D.
26. At all times relevant hereto, Defendant PICA was a church or religious childcare center registered with the South Carolina Department of Social Services pursuant to Article 9 of Chapter 13, Title 63 of the South Carolina Code. PICA operated under South Carolina Child Care Registration No. 18530 and was subject to the statutory requirements governing registered church and religious childcare centers.
27. South Carolina law requires several background checks before a person may be employed by, or provide caregiver services at, a licensed, registered, or approved childcare facility including but not limited to: SLED fingerprint-based criminal-history checks, FBI fingerprint-based criminal-history check, DSS Central Registry check for child abuse or neglect; National Crime Information Center National Sex Offender Registry search, South Carolina Sex Offender Registry search; and corresponding criminal, child-abuse, and sex-offender checks

- in every state in which the person lived during the preceding five years. S.C. Code § 63-13-40(D)(1)–(2)
28. These checks generally must be repeated every five years. S.C. Code § 63-13-40(D)(6).
29. S.C. Code § 63-13-40(A)(1) provides that a licensed, approved, or registered childcare facility may not employ a caregiver or other staff member who is required to register, or is registered, on the national or state sex-offender registry. Sexual Exploitation of a Minor is also an offense within Chapter 15 of Title 16, which is one of the expressly disqualifying categories.
30. S.C. Code § 63-13-1010(G) requires the same checks for a person seeking employment or seeking to provide caregiver services at a church or religious childcare center. It also forbids registration where an operator, caregiver, or employee has a disqualifying conviction.
31. Defendant Perry was not merely an occasional visitor. Defendants selected, authorized, scheduled, directed, retained, supervised, and controlled Defendant Perry to perform recurring custodial, maintenance, caregiver, and other services for Defendant Church and Defendant PICA, whether characterized by Defendants as an employee, servant, staff member, custodian, caregiver, agent, contractor, volunteer, or otherwise.
32. Defendant Perry's assigned and permitted activities regularly brought him into classrooms, childcare rooms, outdoor play areas, and other locations occupied by minor children. Defendant Perry interacted directly with minor children, participated in activities with them, provided assistance or direction to them, and had direct access to minor children outside the immediate presence and effective supervision of a person who had undergone the required background checks.

33. By reason of the nature of his duties, the regularity of his services, Defendants' right to direct and control his work, and his direct access to children, Defendant Perry functioned as an employee, servant, staff member, custodian, caregiver, agent, contractor, volunteer, or other person performing services on behalf of Defendants within the meaning and protective purposes of Sections 63-13-20, 63-13-40, and 63-13-1010, regardless of how Defendants characterized his relationship with Defendant Church or Defendant PICA.
34. Defendants failed to submit Defendant Perry for the background checks required by South Carolina law, failed to maintain documentation establishing that he had received the required clearances, and/or permitted him to provide services and have access to minor children despite actual knowledge that any such check would disclose his disqualifying conviction and sex-offender registration.
35. Alternatively, even if Defendant Perry's duties did not technically require fingerprint-based checks, Defendants knew his actual criminal history and registered-sex-offender status. Their failure to exclude him from the childcare campus, restrict his access, continuously supervise him, and warn the persons responsible for protecting the minor children violated the ordinary and heightened duties of reasonable care voluntarily assumed by Defendants.
36. Defendants knew, or in the exercise of reasonable care should have known, that the statutory background screening requirements reflected the General Assembly's determination that registered sex offenders present an unacceptable risk to minor children attending licensed and registered childcare facilities. Notwithstanding those statutory protections, Defendants knowingly permitted Defendant Perry to perform duties that brought him into repeated contact with minor children.

37. Defendants owed Plaintiffs and all enrolled students a duty to exercise reasonable care in protecting minor children from foreseeable harm, including harm posed by employees, volunteers, contractors, invitees, and any other adults permitted access to Defendant PICA campus. Said duties included, but were not limited to:
- a) Exercising reasonable care in selecting, screening, authorizing, supervising, retaining, assigning, and controlling employees, staff members, caregivers, custodians, agents, contractors, volunteers, and all other persons permitted to perform services or have access to minor children;
 - b) Conducting appropriate background investigations;
 - c) Restricting access to children by individuals presenting foreseeable risks;
 - d) Implementing and enforcing reasonable child protection policies;
 - e) Monitoring individuals permitted on school property;
 - f) Complying with all applicable laws, regulations, licensing requirements, and accepted child safety practices;
 - g) Properly training employees concerning child safety and reporting obligations; and
 - h) Taking reasonable steps to prevent foreseeable harm to the children entrusted to Defendants' care.
38. Upon information and belief, Defendant Perry first became associated with Defendant Church during or about the year 2020.
39. Defendant Perry had previously been arrested and was subsequently convicted of Sexual Exploitation of a Minor arising from criminal conduct occurring in approximately 2020.

40. Pursuant to his conviction, Defendant Perry became a registered sex offender and was placed under the supervision of the South Carolina Department of Probation, Parole and Pardon Services.
41. Upon information and belief, Defendant Perry was subject to conditions of probation governing his activities and restricting his contact with minor children.
42. Despite Defendant Perry's criminal history and probationary status, Defendants permitted Defendant Perry to remain actively involved on Defendant Church and Defendant PICA campus.
43. Upon information and belief, Defendant Williams personally approved, authorized, ratified, or otherwise permitted Defendant Perry to attend Defendant Church functions and later perform maintenance and other services on Defendant Church and Defendant PICA property.
44. Defendant Williams has publicly acknowledged that Defendant Perry first attended Defendant Church following his arrest and was thereafter permitted to become involved in Defendant Church activities.
45. Defendant Williams has further publicly acknowledged that Defendant Perry later performed maintenance and other services on Defendant Church and Defendant PICA campuses while Defendant Williams believed safeguards had been implemented governing Defendant Perry's activities.
46. Upon information and belief, Defendant Perry became a regular presence on Defendant Church and Defendant PICA campus over a period of several years.
47. Upon information and belief, Defendant Perry routinely performed maintenance work and other volunteer services while preschool and elementary-aged children were present.

48. Upon information and belief, Defendant Perry was regularly observed by students, teachers, parents, volunteers, and Defendant Church staff while performing work on the campus.
49. Upon information and belief, Defendant Perry became familiar to numerous minor children attending Defendant PICA and was known by many students as "Mr. Warren."
50. Upon information and belief, Defendants affirmatively authorized Defendant Perry to perform regular duties on the Defendant Church and Defendant PICA campus, entrusted him with responsibilities ordinarily associated with trusted staff members or volunteers, permitted him to develop familiarity and rapport with students, parents, and teachers, and thereby clothed him with the apparent authority of a trusted representative of Defendant Church and Defendant PICA despite actual knowledge of his criminal history and registered sex offender status.
51. Parents enrolling their children at Defendant PICA, including Plaintiffs, reasonably relied upon Defendants to provide a safe educational environment and to exercise reasonable care in protecting the minor children entrusted to their care.
52. Parents of Defendant PICA students have publicly reported that their minor children interacted with Defendant Perry during routine school activities, including outdoor activities, watering flowers, playing frisbee, and celebrating Defendant Perry's birthday.
53. Defendant Perry's continued presence on campus was open, obvious, and well known to Defendant Williams, Defendant Howard, Church leadership, Defendant PICA administration, employees, and numerous members of the congregation.
54. At all times relevant hereto, Defendants knew, or in the exercise of reasonable care should have known, that permitting a convicted sex offender to regularly volunteer and work on a

campus serving preschool and elementary-aged children created an unreasonable and foreseeable risk of harm.

55. Despite such knowledge, Defendants continued permitting Defendant Perry to perform services on behalf of Defendant Church and Defendant PICA and remain on Defendant Church and Defendant PICA campus.
56. Upon information and belief, Defendant Howard, while serving as Director of Defendant PICA, possessed actual knowledge of Defendant Perry's criminal history and his continued activities on campus.
57. Upon information and belief, Defendant Howard participated in decisions regarding Defendant Perry's continued presence at Defendant PICA and the implementation or supervision of any restrictions placed upon him.
58. During or about July 2026, former Defendant PICA teacher Allie Osborne discovered that Defendant Perry was listed on the South Carolina Sex Offender Registry.
59. Upon information and belief, Ms. Osborne and another Defendant PICA teacher, publicly identified as Erika, immediately reported their concerns regarding Defendant Perry to Defendant Howard and Defendant Williams.
60. Upon information and belief, Ms. Osborne and Ms. Erika were advised that Defendant Church and Defendant PICA leadership were already aware of Defendant Perry's criminal history and status as a registered sex offender.
61. Upon information and belief, despite possessing such knowledge, Defendants continued permitting Defendant Perry to perform services and remain on Defendant PICA campus.

62. Upon information and belief, after determining that Defendant Perry continued to have access to minor children attending Defendant PICA, Ms. Erika reported the matter to law enforcement and/or the South Carolina Department of Probation, Parole and Pardon Services.
63. Following that report, law enforcement and probation authorities initiated an investigation into Defendant Perry's activities while volunteering at Defendant Church and Defendant PICA.
64. As a result of that investigation, Defendant Perry was arrested and charged with violating the conditions of his probation.
65. Following Defendant Perry's arrest, Defendant Williams conducted a public meeting with members of Defendant Church congregation concerning Defendant Perry's involvement with Defendant Church and Defendant PICA.
66. During that meeting, Defendant Williams publicly acknowledged that Defendant Perry's criminal conviction and status as a registered sex offender were known to him personally, members of Defendant Church leadership, members of Defendant Church staff, and the leadership of Defendant PICA.
67. Upon information and belief, Defendant Williams further publicly acknowledged that classroom teachers were intentionally not informed of Defendant Perry's criminal history because Defendant Church leadership elected to limit dissemination of that information to a select group of individuals.
68. Upon information and belief, Defendant Williams publicly acknowledged that Defendant Church leadership believed Defendant Perry was complying with the conditions of his probation while volunteering at Defendant Church and Defendant PICA.

69. Upon information and belief, Defendant Williams personally participated in, approved, ratified, or acquiesced in the decisions permitting Defendant Perry to remain on Defendant Church and Defendant PICA property despite knowledge of Defendant Perry's criminal history and status as a registered sex offender.
70. Defendant Williams further acknowledged that, after Defendant Perry's arrest, he learned directly from Defendant Perry's probation officer that Defendant Perry had not been complying with the conditions of his probation despite repeatedly assuring Defendant Church leadership that he was.
71. Upon information and belief, Defendant Williams personally participated in, approved, ratified, or acquiesced in the decision not to disclose Defendant Perry's criminal history to teachers, parents, or other persons responsible for the safety of students attending Defendant PICA.
72. Following the public disclosure of Defendant Perry's volunteer activities and the resulting public outcry, Defendant Williams resigned as Senior Pastor of Defendant Church.
73. Upon information and belief, Defendants failed to independently verify Defendant Perry's compliance with the conditions of his probation before permitting him continued access to Defendant Church and Defendant PICA property.
74. Upon information and belief, Defendants failed to implement and enforce reasonable policies and procedures designed to protect students from the foreseeable risks associated with permitting a convicted sex offender to regularly volunteer and work on a campus serving preschool and elementary-aged children.
75. Upon information and belief, Defendants failed to adequately supervise Defendant Perry while he was present on Defendant Church and Defendant PICA property.

76. Upon information and belief, Defendants failed to warn teachers, parents, or other individuals responsible for the safety of students that Defendant Perry had previously been convicted of Sexual Exploitation of a Minor.
77. Plaintiffs are informed and believe that discovery will reveal additional communications, emails, text messages, volunteer applications, Defendant Church records, Defendant PICA records, meeting minutes, policies, incident reports, surveillance footage, and other documents demonstrating Defendants' knowledge of Defendant Perry's criminal history, the decisions permitting his continued access to minor children, and the extent of his activities while on campus.
78. During the period that Defendant Perry was permitted to volunteer and remain on the Defendant PICA campus, Plaintiffs' minor child, J.D., attended Defendant PICA.
79. As a direct and proximate result of Defendants' acts and omissions, J.D. sustained serious injuries and damages, the full nature and extent of which continue to be evaluated.
80. As a direct and proximate result of the Defendants' acts and omissions, J.D. and his parents will be subjected to mental anguish, emotional disturbance and it is expected J.D. will be subjected to medical and forensic evaluations.
81. As a direct and proximate result of the Defendants' acts and omissions Plaintiff's John Roe and Jane Roe, suffered the severe shock, excitement and emotional distress of discovering that a registered sex offender had access to and was in proximity of J.D.
82. Plaintiffs John Roe and Jane Roe have likewise sustained damages recoverable under the laws of the State of South Carolina arising from the injuries suffered by their minor child.

FOR A FIRST CAUSE OF ACTION
NEGLIGENCE, GROSS NEGLIGENCE, RECKLESSNESS, AND WILLFUL CONDUCT
(Against Defendants Pawleys Island Community Church, Pawleys Island Christian Academy,
Donald Williams, Virginia Lee ("Ginny") Williams, and Jennifer "Niki" Howard.)

83. Plaintiffs repeat and reallege the preceding paragraphs as if fully set forth herein.
84. Defendants Church, PICA, Williams, Ginny Williams, and Howard each owed Plaintiffs and J.D. duties of reasonable care, including duties to protect J.D. from foreseeable harm, reasonably supervised persons permitted on the campus and take reasonable precautions concerning individuals known to present a risk to minor children
85. These Defendants, including Defendants Williams, Ginny Williams, and Howard, breached their duties through the acts and omissions alleged above, including, but not limited to:
- a) Permitting Defendant Perry to function as an employee, staff member, caregiver, custodian, volunteer, and/or person providing caregiver services within the meaning and protective purposes of South Carolina childcare statutes while knowing he was a registered sex offender;
 - b) Failing to determine, document, or accurately classify Defendant Perry's status as an employee, staff member, caregiver, custodian, contractor, volunteer, or other person regularly providing services to Defendant Church and Defendant PICA;
 - c) Failing to conduct, obtain, maintain, or document the criminal history, child abuse registry, fingerprint, sex offender registry, and other background checks required by South Carolina law;
 - d) Permitting Defendant Perry continued access to minor children after acquiring actual knowledge of his conviction, registration status, and probationary restrictions, rendering any additional screening unnecessary to appreciate the danger presented;
 - e) Concealing Defendant Perry's criminal history and registered sex offender status from classroom teachers, caregivers, and other individuals charged with supervising and protecting minor children;

- f) Granting Defendant Perry apparent authority, familiarity, trust, and repeated interaction with students attending Defendant PICA;
 - g) Failing to comply with applicable statutes, regulations, written child-protection policies, volunteer policies, and sex offender policies;
 - h) Failing to accurately disclose Defendant Perry's actual duties, responsibilities, access to minor children, and activities on campus to probation authorities;
 - i) Permitting Defendant Perry to remain on campus despite actual knowledge that his continued presence created a foreseeable and unreasonable risk of harm; and
 - j) Committing such additional negligent, reckless, grossly negligent, willful, and wanton acts and omissions as discovery may reveal.
86. Defendants' violations of the foregoing statutory duties, regulations, and child-protection requirements constitute evidence of negligence and negligence per se to the extent permitted under South Carolina law.
87. As a direct and proximate result of these Defendants' conduct, J.D. sustained injuries and damages, and John Roe and Jane Roe sustained damages in their individual capacities, all in an amount to be determined by the jury.
88. The reckless, willful, and wanton conduct of these Defendants entitles Plaintiffs to an award of punitive damages under South Carolina law.

FOR A SECOND CAUSE OF ACTION
NEGLIGENT SUPERVISION

(Against Defendants Pawleys Island Community Church, Pawleys Island Christian Academy, Donald Williams, Virginia Lee ("Ginny") Williams, and Jennifer "Niki" Howard.)

89. Plaintiffs repeat and reallege the allegations contained in the preceding paragraphs as though fully set forth herein.

90. At all relevant times, Defendants Church, PICA, Williams, Ginny Williams, and Howard exercised the right and ability to control Defendant Perry's presence, assignments, work, schedule, access to buildings, possession of keys, use of Defendant Church and Defendant PICA property, interactions with students, and continued participation in activities occurring on Defendant Church and Defendant PICA premises.
91. Defendants knew, or in the exercise of reasonable care should have known, that Defendant Perry had been convicted of Sexual Exploitation of a Minor, was a registered sex offender, and was serving a sentence of probation.
92. Despite such knowledge, Defendants permitted Defendant Perry to remain on Defendant Church and Defendant PICA campus and to perform maintenance, custodial, caregiver, employee, volunteer, or other services in areas regularly occupied by preschool and elementary-aged children.
93. Defendants failed to exercise reasonable supervision over Defendant Perry, failed to adequately monitor his activities, failed to ensure compliance with any restrictions placed upon him, and failed to take reasonable measures to prevent foreseeable harm to students.
94. Defendants knew or should have known that inadequate supervision of Defendant Perry created an unreasonable and foreseeable risk of harm to the minor children entrusted to their care.
95. As a direct and proximate result of Defendants' negligent supervision, Plaintiffs sustained the injuries and damages alleged herein.

FOR A THIRD CAUSE OF ACTION
PREMISE LIABILITY

(Against Defendants Pawleys Island Community Church, Pawleys Island Christian Academy, Donald Williams, Virginia Lee ("Ginny") Williams, and Jennifer "Niki" Howard.)

96. Plaintiffs repeat and reallege the allegations contained in the preceding paragraphs as though fully set forth herein.
97. At all times relevant hereto, Defendants owned, leased, occupied, operated, managed, maintained, supervised, and controlled the premises upon which Defendant PICA was located.
98. J.D. was lawfully upon the premises as a student and business invitee of Defendants.
99. Defendants owed J.D. the duty to exercise reasonable care to maintain the premises in a reasonably safe condition and to protect students from known or reasonably foreseeable dangers.
100. Defendants created and maintained an unreasonably dangerous circumstance on the premises by knowingly granting Defendant Perry continuing access, authority, familiarity, and opportunity to interact with young children while withholding his known criminal history and registered sex offender status from the teachers, caregivers, and other persons responsible for protecting those minor children.
101. Defendants failed to exercise reasonable care to eliminate, control, or adequately protect students from the foreseeable risks created by the activities they authorized and permitted to occur on the premises, despite actual knowledge of Defendant Perry's criminal history, registered sex offender status, and the danger posed by his continued presence and access to minor children.
102. Defendants further failed to implement reasonable procedures to restrict Defendant Perry's access to areas occupied by minor children or otherwise protect students from foreseeable harm.

103. As a direct and proximate result of Defendants' failure to maintain the premises in a reasonably safe condition, Plaintiffs sustained the injuries and damages alleged herein.

FOR A FOURTH CAUSE OF ACTION
NEGLIGENT SELECTION, AUTHORIZATION, RETENTION, AND CONTROL OF
EMPLOYEE, STAFF MEMBER, CUSTODIAN, CAREGIVER, AGENT, AND/OR
VOLUNTEER
(Against Defendants Pawleys Island Community Church, Pawleys Island Christian Academy,
Donald Williams, Virginia Lee ("Ginny") Williams, and Jennifer "Niki" Howard.)

104. Plaintiffs repeat and reallege the allegations contained in the preceding paragraphs as though fully set forth herein.
105. At all relevant times, Defendants possessed and exercised the authority to select, authorize, assign, supervise, retain, restrict, remove, discipline, and control Defendant Perry regardless of whether he was an employee, servant, staff member, caregiver, custodian, agent, contractor, volunteer, or other person regularly performing services on behalf of the Defendant Church and Defendant PICA.
106. Defendants knew or, through the exercise of reasonable care, should have known that Defendant Perry had been convicted of Sexual Exploitation of a Minor, was a registered sex offender, and was serving a sentence of probation.
107. Despite possessing such knowledge, Defendants continued to permit Defendant Perry to volunteer, perform work, and remain on Defendant Church and Defendant PICA campus where he had regular access to areas occupied by preschool and elementary-aged children.
108. Defendants failed to remove Defendant Perry from Defendant Church and Defendant PICA campus despite the foreseeable risk his continued presence posed to the minor children entrusted with their care.

109. Defendants further failed to reassess Defendant Perry's continued volunteer status, investigate his compliance with the conditions of his probation, or take reasonable measures to ensure that he posed no danger to students.
110. Defendants knew or should have known that allowing Defendant Perry to continue volunteering under these circumstances created an unreasonable risk of harm to students attending Defendant PICA.
111. As a direct and proximate result of Defendants' negligent selection, authorization, retention, supervision, and control of Defendant Perry, whether acting as an employee, servant, staff member, caregiver, custodian, agent, contractor, volunteer, or otherwise performing services on behalf of Defendants, Plaintiffs sustained the injuries and damages alleged herein.

FOR A FIFTH CAUSE OF ACTION
NEGLIGENCE, GROSS NEGLIGENCE, RECKLESSNESS, AND INTENTIONAL
MISCONDUCT
(Against Defendant Warren Spence Perry)

112. Plaintiffs repeat and reallege the allegations contained in the preceding paragraphs as though fully set forth herein.
113. At all times relevant hereto, Defendant Perry voluntarily undertook activities at Defendant Church and Defendant PICA which brought him into contact with minor children, including Plaintiffs' minor child, J.D.
114. Defendant Perry owed J.D. a duty to exercise reasonable care and to refrain from engaging in conduct that would endanger, exploit, abuse, harass, intimidate, or otherwise cause harm to J.D.

115. Defendant Perry knew or should have known that his conduct would likely cause injury to J.D.
116. Defendant Perry's conduct was negligent, grossly negligent, reckless, willful, wanton, intentional, and in conscious disregard for the rights and safety of J.D.
117. As a direct and proximate result of Defendant Perry's conduct, J.D. sustained severe personal injuries, emotional distress, mental anguish, psychological injuries, and other damages, the full extent of which continue to be evaluated.
118. Plaintiffs John Roe and Jane Roe likewise sustained damages recoverable under South Carolina law arising from the injuries suffered by their minor child.
119. Defendant Perry's conduct was willful, wanton, reckless, intentional, and demonstrated a conscious disregard for the rights and safety of Plaintiffs, thereby entitling Plaintiffs to recover punitive damages,

WHEREFORE, having fully pled, the Plaintiffs request the following:

1. A Jury trial;
2. Judgment against the Defendants for actual and punitive damages in an amount be determined by a jury;
3. Costs of this action;
4. Such other and further relief as the court deems just and proper.

s/Robert C. Childs, III

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